

EXHIBIT B

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS
ANTITRUST LITIGATION

Master File No. 12-md-02311

In Re: All Cases

Hon. Marianne O. Battani

THIS DOCUMENT RELATES TO:

All Actions

**AFFIDAVIT OF DAVEY JUNG
ON BEHALF OF HINO MOTORS MANUFACTURING U.S.A., INC.**

STATE OF MICHIGAN)
) §
COUNTY OF OAKLAND)

Davey Jung, after first being duly sworn, deposes and says:

1. I am a Senior Vice President of Hino Motors Manufacturing U.S.A., Inc. (“HMM”). My areas of responsibility include Purchasing, Sales, Research & Development, and Corporate Strategy Development.

2. HMM is engaged in several lines of business, one of which is that it is an original equipment manufacturer (“OEM”) in the United States medium-duty

truck market. I understand that HMM has been served with a subpoena in this litigation in its capacity as an OEM.

3. HMM has been an OEM in the United States vehicle market since 2003. Specifically, since 2003 HMM has assembled a small number of Class 4 – 7 trucks as set forth in the table below:

<u>Year</u>	<u>Number of Trucks Assembled by HMM for U.S. Vehicle Market</u>
2003	1,881
2004	2,343
2005	3,856
2006	6,137
2007	5,144
2008	4,886
2009	3,149
2010	3,656
2011	4,838
2012	6,244
2013	6,575
2014	8,526
2015	10,673
TOTAL	67,908

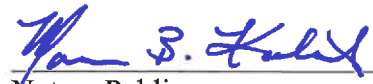
4. In each year, HMM has purchased approximately 50% to 60% of the parts it has used in assembling those trucks in kits acquired from Japan. (HMM has sourced the remaining 40% to 50% of the parts in the NAFTA territory, predominantly the United States and Canada.) Accordingly, HMM does not possess upstream purchasing information of the kind sought by the subject subpoena for the majority of the parts it has purchased.

5. HMM's sole customer for the trucks it has assembled for sale in the United States is a separate entity called Hino Motors Sales U.S.A., Inc. HMM does not possess any downstream sales information of the kind sought by the subject subpoena.

Further Affiant Sayeth Not.


Davey Jung

Subscribed and sworn to before me,
this 12 day of FEBRUARY, 2016.


Notary Public

